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ABSTRACT

This essay examines the delicate balance of accreditation, the federal government, and the self-regulation of higher education. It explores the challenge of distance learning and what is needed to keep this balance in check. It briefly addresses two related areas in which the responsibilities of institutions and accreditors are growing because of distance learning: protecting students and the public against poor-quality higher education and attending to quality in the emerging internationalization of higher education. This delicate balance of accreditation, the availability of federal money, and the self-regulation of colleges and universities will require careful attention in the future. Distance learning, by altering the academic work of colleges, is changing the responsibilities of accreditors and the expectations of government about what accreditation should do to assure quality. Six appendixes contain supplemental information about accreditation nationally and internationally. (SLD)

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Challenges, Choices,
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SECOND IN A SERIES

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Maintaining the Delicate Balance:

Distance Learning, Higher Education Accreditation, and the Politics of Self-Regulation

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SECOND IN A SERIES

Maintaining the Delicate Balance:

Distance Learning, Higher Education Accreditation, and the Politics of Self-Regulation

Judith S. Eaton

This paper is based on Distance Learning: Academic and Political Challenges for Higher Education Accreditation, *by J.S. Eaton (Number 1 in Council for Higher Education Accreditation Monograph Series 2001), Washington, DC.*

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Distributed Education: Challenges, Choices, and a New Environment

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Foreword

Maintaining the Delicate Balance: Distance Learning, Higher Education Accreditation, and the Politics of Self-Regulation is the second monograph in a series of invited papers on distributed education commissioned by the American Council on Education (ACE) and EDUCAUSE.

Accreditation and federal support of higher education are based on a traditional model of education with students and a faculty member in a classroom. Distance education offers a new model of higher education that is not site-based. This paper describes the challenge of regulating distance education providers and funding students who participate in distance education courses. The paper also examines two related areas in which the responsibilities of institutions and accreditors are growing because of distance learning: protecting students and the public against poor-quality higher education, and attending to quality in an increasingly internationalized higher education marketplace.

The genesis of this series evolved from a design meeting held at ACE in spring 1999. Extensive discussion and exploration of major issues led to a partnership with EDUCAUSE and a close working relationship with its president, Brian L. Hawkins, and vice president, Carole A. Barone.

This series, *Distributed Education: Challenges, Choices, and a New Environment,* has been sustained with generous support from the AT&T Foundation, Accenture, and the Compaq Corporation.

"Distance" or "distributed" learning raises a strategic and financial challenge for every type of higher education institution. Advancements in technology and expansion of markets for distributed learning pose questions for college and university presidents, regardless of their institutional mission. Our goal in this series is to provide presidents, provosts, and other senior decision makers with a sense of the landscape of technologically mediated education and the means to make wise strategic choices.

Michael A. Baer
Senior Vice President, Programs & Analysis
American Council on Education

Introduction

The delicate balance of accreditation to assure quality in higher education, the self-regulation of higher education institutions, and the availability of federal money to colleges and universities has been central to higher education for many years. However, the emergence of distance learning–the electronic delivery of higher education degrees, programs, courses, and services–has the potential to undo this balance and the political understandings that accompany it. If this were to happen, 50 years of a productive arrangement between the federal government and higher education could be, at minimum, jolted.

This delicate balance rests, first and foremost, on government's acceptance of institutional and programmatic accreditation as a reliable affirmation of quality in higher education. It is through the commitment to accreditation that higher education claims its self-regulation efforts are effective. For many years, the federal government has, by and large, accepted this claim for the predominantly site-based activities of higher education. The federal government relies on accredited status as a signal that institutions and programs demonstrate sufficient quality to warrant allocation of federal funds (e.g., money for student grants and loans, research, and other federal programs). If accreditation were perceived as failing to affirm quality, the likely reaction would be a substantial increase in government regulation of higher education and an erosion of its self-regulation status.

As distance learning activity expands and diversifies, the federal government, as it has done in the case of site-based learning, is turning to accreditation to affirm that distance learning providers are meeting quality expectations. Accreditation has emerged as a significant factor in maintaining the availability of federal funds in these distance learning environments and maintaining higher education's independence from government regulation.

This essay examines this delicate balance of accreditation, the federal government, and the self-regulation of higher education. It explores the challenge of distance learning and what is needed to keep this balance in check. It briefly addresses two related areas in which the responsibilities of institutions and accreditors are growing because of distance learning: protecting students and the public against poor-quality higher education, and attending to quality in the emerging internationalization of higher education. These areas, too, are affecting the balance that needs to be maintained.

Accreditation has emerged as a significant factor in maintaining the availability of federal funds in these distance learning environments and maintaining higher education's independence from government regulation.

The Impact of Distance Learning

Whether distance learning spells the end of traditional campuses, as some maintain, or whether distance learning instead represents a powerful addition to a growing array of delivery options for higher education, its impact on higher education is great and growing. Distance learning is creating alternative models of teaching and learning, new job descriptions for faculty, and new types of higher education providers.

The most familiar impact of distance learning is the growth of credit-bearing distance learning offerings and enrollments at accredited, degree-granting colleges and universities. In the 1997-98 academic year, 1.6 million students were enrolled in 54,000 college-level, credit-bearing distance learning courses in 1,680 degree-granting colleges and universities. These courses were delivered electronically, via television, or by mail (U.S. Department of Education, 1999). These offerings and enrollments are anticipated to grow dramatically. Dun and Bradstreet, for example, estimates that the number of institutions offering distance learning programs nearly doubled in 1999 (Dun and Bradstreet, 2000).

Another major impact of distance learning is the appearance of "new providers" of higher education: freestanding online institutions, higher education consortia (degree-granting and non-degree-granting), corporate universities, and unaffiliated online providers of courses and programs. These new providers fall into the following categories:

- *New freestanding, degree-granting online institutions:* A small number of high-profile new providers of distance learning—sometimes called "virtual universities." These include degree-granting, nonprofit institutions and degree-granting, for-profit distance learning providers.
- *Degree-granting consortia:* A network of institutions from which students may select a range of online courses and programs and earn a degree granted by the consortia.
- *Non–degree-granting consortia:* A network of degree-granting institutions from which students may select a range of online courses and programs but which require that students earn a degree from a member institution.
- *Corporate universities:* Corporations that maintain private teaching and training enterprises initially enrolling employees and, increasingly, enrolling outside customers as well. Many of these corporate universities are still site based, but they are moving quickly to online modes of operation.
- *Unaffiliated providers of online programs and courses:* Online courses and programs that are not affiliated with any institution. These range from credit-bearing educational activities to single-instance noncredit offerings (for example, a four-hour online seminar).

The most familiar impact of distance learning is the growth of credit-bearing distance learning offerings and enrollments at accredited, degree-granting colleges and universities.

Both impacts—the development of distance learning in traditional institutions and the emergence of electronically based new providers—will continue to be with us in higher education. However, a hybrid model of distance learning likely will be increasingly common in the foreseeable future. In this hybrid mode, site-based and electronically delivered instruction and support services will be offered together, whether from traditional institutions or new providers. Today, students attend traditional campuses while taking courses online. Faculty are designing teaching and learning environments that rely on both face-to-face contact and online access. Institutions are offering courses, programs, and degrees that are site based, electronically delivered, and a combination of both.

The Challenge of Distance Learning to Accreditation

Distance learning is creating significant challenges for accreditation because accreditation values, policies, and practices were created in an era of site-based education. This has meant that accreditors, and the faculty and administrators on review teams perform primarily site-based tasks: visiting campuses, examining classrooms, touring facilities, and, in general, scrutinizing the resources and capacity of an academic community, especially the teaching and learning environment. Distance learning involves an alternative array of resources and capacities such as electronic classrooms and campuses. The educational environments that accreditors observe are changing, as are the questions that they need to ask.

Through electronic communication, remote access, and virtual faculty-student relationships, distance learning goes to the heart of the higher education enterprise–teaching and learning. Accreditors are now called upon to review institutions and programs that routinely involve three key components:

- *Computer-mediated classrooms:* Faculty and students engage with each other electronically, relying heavily on the written word rather than face-to-face exchange.
- *Separation in time between communications:* Teachers and students depend on asynchronous modes of communication, such as e-mail exchanges.
- *Availability of online services:* Student services such as advising, counseling, mentoring, and library services are integrated with the online teaching and learning environment.*

Distance learning challenges accreditation by altering the traditional faculty role in higher education, thus diminishing face-to-face contact with students. It may also alter the fundamental intellectual tasks of faculty members. Some distance learning models, for example, separate curriculum design from curriculum delivery, substituting standardized course content for curricula designed by individual faculty members. Similarly, distance learning can shift the responsibility for determining academic standards from faculty members to the staff of corporate or other distance learning providers or standards may already be embedded in commercially prepared curricula.

[D]istance learning can shift the responsibility for determining academic standards from faculty members to the staff of corporate or other distance learning providers.

Distance learning challenges accreditation by altering what we mean by "higher education institution," replacing or augmenting lecture halls with chat rooms, campuses with the World Wide Web, and communities of learning with the borderless networks of cyberspace. An "institution" no longer needs to be anchored in physical space and time; it can exist anywhere, anytime–a liberating notion, in one sense, but a notion that raises important questions about whether the Internet can substi-

* For a further discussion of these issues, see *Distributed Learning and Its Challenges: An Overview* (2001), the first paper in the ACE/EDUCAUSE series, Distributed Learning: Challenges, Choices, and a New Environment.

Distance learning challenges accreditation by altering what we mean by a college degree.

tute for the campus as a supportive environment for creative learning.

Distance learning challenges accreditation by altering what we mean by a college degree. Electronic access encourages and supports more mobile student behavior, allowing students to attend more than one institution either serially or simultaneously, online or onsite. The college degree, traditionally the culmination of a distinctive institutionally based experience, is coming to represent a different type of experience: the completion of an idiosyncratic amalgam of educational experiences selected by the student from a number of unrelated institutions and delivered by a mix of technological as well as physical means.

These changes in faculty work, institutional operation, and student behavior are putting pressure on accreditors to undertake additional responsibilities. Their success in meeting the challenge of assuring quality in distance learning relies on the alacrity with which they undertake certain tasks:

- Identifying the distinctive features of distance learning delivery, whether within traditional settings or supplied by new providers.
- Modifying accreditation guidelines, policies, or standards to assure quality within the distinctive environment of distance delivery.
- Paying additional attention to student achievement and learning outcomes in virtual or all-electronic distance learning environments where site-based features are not present.

Distance Learning and Familiar Political Understandings

How is distance learning changing familiar political understandings? Until recently, most decisions by the higher education community and the government about education quality and the use of federal funds were made primarily in the context of site-based education delivery. As with accreditation, the site-based model of education was a given: Students, whether full- or part-time, came to physical campuses, attended classes, and participated in other onsite activities. Both the accountable use of student aid and other federal funds and the effectiveness of institutions in creating environments for student learning were assessed on the basis of the verifiable physical presence of students at verifiable physical locations over measurable amounts of time. We knew how federal funds were used, and we knew students were learning because we could observe these things firsthand.

By contrast, distance learning creates an electronically based environment for higher education that is not entirely, and sometimes not at all, dependent on physical presence and physical space. This sounds simple–merely a shift from physical space to cyberspace. But just as electronic technology is profoundly affecting other sectors and issues–from retailing to intellectual property rights to health care–distance learning also is powerfully affecting the foundations on which the understanding between government and higher education was built. For both parties to this understanding, the safety and familiarity of physical site and presence is being replaced with the uncertainty and the unknown of the electronic environment.

Three issues concern the federal government as this shift is taking place:

- Can the federal funds be delivered in a distance learning environment–i.e., can fraud and abuse be avoided? (This is also a concern for state governments, which are primarily responsible for consumer protection through the licensing of private colleges and universities and through the authorization of public institutions.)
- Can accreditation continue to be relied upon to assure quality in a distance learning environment, or will alternative forms of quality review be needed?
- And, more broadly, can the federal government remain comfortable with the principle of self-regulation in higher education as distance learning expands, or are more government controls needed?

[T]he government needs to be confident that student aid dispensed in distance learning settings is going to students who actually participate in courses and programs.

The future of higher education and the political understanding between quality and the use of federal funds depend on the answers to these three questions.

With respect to the safe delivery of federal funds, the government needs to be confident that student aid dispensed in distance learning settings is going to students who actually participate in courses and programs. Government needs the cooperation of higher education to stop distance learning providers who would

exploit students seeking higher education by offering credentialing opportunities over the Internet that are "too good to be true"–opportunities that may involve high tuition costs to be covered, in part, by federal funds. Government needs assistance from higher education as it seeks to protect students from fly-by-night distance learning providers, who are present one day and disappear the next.

In terms of accreditation and self-regulation, government needs the accreditation community to assure that it can continue to review and promote quality in higher education, even in the face of significant academic changes driven by distance learning, and student aid grants and loans will purchase a quality educational experience in a distance environment. Government is keenly aware that distance learning is exerting pressure on the accreditation community to expand and modify its site-based model of quality and self-regulation and is watching carefully to see how successfully accreditors and the institutions they review respond to this challenge.

Government officials have legitimate and important concerns about the impact of distance learning. We in the higher education community–whether institutional or accreditation leaders–have an obligation to acknowledge the implications of distance learning for our political understandings with government about public funding and about quality. Nurturing and, if necessary, adjusting these political understandings to prevent their disruption amidst a changing educational environment are essential to preserving self-regulation and institutional autonomy.

Distance Learning, Federal Fund Availability, and Accreditation

Institutions, accreditors, and government can work together profitably to address the potential impact of distance learning on accreditation and availability of federal funds–and the creative tension that this causes. Several issues to be pursued are:

- *Defining the term "course":* "Course" has traditionally referred to a three-credit offering (or variations such as two or more credits) that is part of a curriculum. This credit may not count toward a degree. "Course" also has come to refer to offerings that are not part of a curriculum and do not carry credit. Distance learning creates tension by rapidly increasing the number of courses that are not part of a curriculum, do not carry credit, and do not lead to a degree.
- *Measuring time:* "Time" traditionally has referred to the period students spend in a classroom or studying. The government has required evidence of time spent in the classroom or studying to allow students to receive federal student aid. Distance learning creates tension by not always allowing for measuring time in the same manner–students may not be in physical classrooms, and what is considered "studying" may be defined differently from 10 years ago.
- *Documenting student learning outcomes:* Accreditors traditionally have been used to using grades to describe how well students have learned. Distance learning creates tension by emphasizing competencies as well as grades: Direct access to information about student performance supersedes faculty judgment in the form of grades.
- *Changing student attendance patterns:* Student attendance at primarily one institution (whether full-time or part-time) is yielding to student attendance patterns that include attendance at more than one institution to obtain a degree. Distance learning creates tension because it is an important enabler of these new attendance patterns.

The federal government has published two reports to help attract additional attention to the above issues and to the tensions that distance learning introduces. These reports frame some of the questions that must be addressed to preserve political understandings and the delicate balance between higher education and the government. Both reports address distance learning: One focuses on distance learning and student aid availability, and the other specifically addresses distance learning and its relation to accreditation (among other issues).

The *Report to Congress on the Distance Education Demonstration Program* (U.S. Department of Education, 2001) raises important core questions about student aid availability, including some of the issues discussed already. The report details the work to date in the Distance Education Demonstration Program authorized by the 1998 amendments to the federal 1965 Higher Education Act. The focus of the demonstration program is to develop effective means to provide student aid while assuring quality, emphasizing student achievement, and preventing fraud and abuse in distance learning environments. The first

Distance learning creates tension by rapidly increasing the number of courses that are not part of a curriculum, do not carry credit, and do not lead to a degree.

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phase of the demonstration program involved eight institutions, five systems, and two consortia for a total of 111 institutions offering electronically based distance learning. The key to the program's success will be determining how the lessons learned can be translated into practices and expectations in distance learning that will help preserve the autonomy of institutions.

The report offers for consideration a "student-based" delivery system for student aid—paying more attention to the student and giving less attention to the means by which an educational experience is provided (e.g., whether the experience is site based or distance based). In a student-based system, the governing assumption that federal funds must be tied to site-based education would be broken. This is because a student-based system removes from consideration the issue of how higher education is delivered.

The report offers the following questions for consideration:

- Should federal policy distinguish among various means of delivering education?
- Should federal requirements to receive student aid change?
- Should current federal rules that treat "correspondence students" (primarily students who rely on education through receiving print materials via mail) differently be retained?
- Are there viable alternatives to the federal government's current manner of measuring instruction that relies on time spent in the classroom or studying?

How we choose to answer the questions raised in the report can fashion student aid availability in the future as well as sculpt the federal government's expectations of accreditation in a distance learning environment.

The second report, *The Power of the Internet for Learning: Moving from Promise to Practice* (Web-based Education Commission, 2000), examines distance learning and its impact on education at all levels. Among other issues, this report specifically addresses the relationship between distance learning and the responsibility of higher education to assure quality through accreditation.

The Web-based Commission report speaks to the importance of voluntary accreditation to assure quality control of web-based learning and, among other tasks, calls upon the accreditation community to do several things:

- Determine whether new accreditation standards and policies are needed.
- Assist colleges and universities as these institutions develop web-based learning.
- Improve capacity for course accreditation in addition to program and institutional accreditation.

The commission report also urges that accreditors and institutions pay much greater attention to student learning outcomes in addition to looking at education resources and capacity. The report urges attention to much-needed consumer information that assists students in making judgments about the quality of institutions and programs based on, among other factors, accredited status.

Both reports affirm that changes brought about by distance learning will need to be matched by changes in student aid policy and accreditation if we are to maintain our delicate balance. This means addressing the key features of student aid decisions and rethinking some accreditation procedures and practices. Adjusting political understandings will require attention to how distance learning affects the fundamental building blocks of federal policy related to student aid and accreditation. It will require attention to issues such as definition of course, the notion of time, and the role of student outcomes. This must be accompanied by attention to how well accreditation sustains rigorous scrutiny of quality.

Distance Learning and Protecting Students Through Expanded Public Information About Quality

The issue of sound consumer information and protecting students from poor-quality education is a growing dimension of the delicate balance of accreditation, availability of federal funds, and self-regulation–especially for accreditors. In the face of new providers and new forms of delivery that are diversifying higher education, government has a growing interest in the capacity of higher education to provide more comprehensive and detailed information about quality to serve the public interest. With 70 percent of high school graduates attending some form of postsecondary education, public interest in the effectiveness of colleges and universities, as well as the value that institutions provide in return for tuition fees that they charge, is high. More and better information about quality is essential.

Traditional providers of higher education fulfill this responsibility in part by pointing to their reputations as highly effective colleges and universities. The accredited status of the institution and its various programs also are important pieces of information for the public. Additionally, institutions provide information about graduation rates, retention and attrition of students, transfer rates, and other indicators of the ways in which they add value.

"New" providers of higher education have a trickier assignment. Many have shorter histories of service and cannot rely as easily on the reputations of their institutions. Like their counterparts with greater longevity, they are building reputations for quality over time. Some may choose to become accredited as an indicator of quality; others may not. Some provide documentation of student competencies gained through attendance in courses and programs.

The accrediting community has an equally challenging assignment. The public increasingly views accreditors as responsible for providing more and more explicit information about not only the quality of traditional institutions but also that of new providers, accredited or unaccredited. More and more frequently, the public calls upon accreditors to answer straightforward questions such as "Is this a quality institution or not?" "What does your accreditation guarantee?" "What is your process for determining quality and how can I have confidence in it?" Students and the public want a blueprint that is easy to follow, some guidance on how to reach quick, reliable judgments about quality in traditional and new settings–what to examine, whom to contact, and how to make comparisons.

The public increasingly views accreditors as responsible for providing more and more explicit information about not only the quality of traditional institutions but also that of new providers, accredited or unaccredited.

Traditional institutions, new providers, and accreditors will need to take additional steps to make more information readily available and understandable to students.

Accreditors need to:

- Expand the information they provide to students and the public, especially by developing strategies that make their specific judgments about quality more explicit to answer the questions above.
- Assure easier availability and clearer descriptions about what accreditation guarantees and what it does not.

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Distance learning creates pressure to reposition accreditation as a source of information about quality.

- Develop more comprehensive efforts to educate the public about the importance of the role of accreditation in our society.
- Strengthen communication about quality among accreditors and with those who undertake alternative forms of external quality review of education and training (e.g., certification boards).

Institutions need to:

- Develop additional strategies to share more detailed information about institutional effectiveness as defined by student success and achievement (e.g., competencies gained, transfer success, entry to graduate school, employment).
- Rely more extensively on the quality of student performance to help students and the public make judgments about overall institutional performance and quality.

Distance learning creates pressure to reposition accreditation as a source of information about quality. The type of information that students, the public, and government want from accreditation is shifting toward more explicit *yes* or *no* responses to whether accreditation assures quality. This is a move away from accreditation judgments that traditionally have functioned more as diagnoses to improve quality rather than as *either-or* statements. Without these yes or no responses, students and others will turn to other sources—including government, the media, or the business sector—to obtain what they need to know about quality. The reputation and seriousness of higher education are at risk, and as accreditors, we have a responsibility to reach beyond the institutions we serve to respond to public need.

Distance Learning and International Quality Assurance

Another emerging dimension of the delicate balance is the internationalizing of higher education–accommodating the growing number of students who cross national boundaries in pursuit of higher education, the faculty willing to pursue scholarly interests wherever in the world these interests might lead, and institutions and programs seeking to expand their presence beyond their home countries. This internationalization is adding to the tasks of accreditors in the United States and those engaged in quality assurance in other countries. Effective management of international quality assurance likely will be required of accreditors as part of maintaining the delicate balance.

Today's discussion of international quality assurance cannot take place without attention to the growth of distance learning, with many countries around the world using distance learning technologies to enlarge their own course, program, and degree offerings and to import and export education programs and services. Countries such as India and South Africa are heavy importers of distance learning programs as they seek to expand educational opportunities for their own citizens. China, Thailand, and Japan employ distance learning technologies to develop their own programs and degrees, bolstering their existing higher education systems. Western and Eastern European countries are struggling to determine what place, if any, distance learning providers have alongside their traditional education providers. The United States, Australia, and the United Kingdom are major exporters of higher education through electronic technology.

Several fundamental questions about quality assurance and accreditation have emerged in the international arena:

- What controls over higher education imports do receiving countries need? What strategies do these countries need to employ to assure that they are importing quality higher education?
- What controls over higher education exports do sending countries need? How can the United States, as a major exporter of higher education, assure that receiving countries have full and useful information about the quality of higher education that is exported?
- Do we need a global ethic to buttress the import and export of higher education? Is there a needed ethos to guide countries in the exchange of higher education that will assure quality and protect the public? Or is the market–viewed by some as a powerful tool to eliminate poor quality–enough?

Effective management of international quality assurance likely will be required of accreditors as part of maintaining the delicate balance.

To date, there are few international answers for these important questions. However, a robust international quality assurance conversation is underway that involves consideration of several potential solutions:

- *A Bilateral Agreement Solution:* Countries engaged in significant import or export of higher education with each other enter into quality assurance agreements. The solution

An international conversation about quality review and the role of the market should result in an international commitment that higher education is a public good that cannot be left solely to competition for students and money.

would likely involve many such agreements; some worry about whether a large number of bilateral agreements makes sense.

- *An International Standards Solution:* Countries around the world come together to develop a single set of international quality assurance standards by which all countries will abide as a framework for the import or export of higher education.
- *A Market Solution:* Countries rely on competition among different institutions and programs to assure quality. The premise here is that poor-quality institutions would not be able to compete against better-quality institutions, and that the former would be weeded from the landscape.
- *A World Trade Organization (WTO) Solution:* Countries would rely on the framework of the liberalization of trade and services, including higher education, currently being explored by the WTO. National and institutional discretion about import and export would be honored, but within an international regulatory framework.

Some highly effective international agreements already exist. The Washington Accord for Engineering is one example. Others, such as the European "Accreditation Scheme" proposal, are under active discussion. Some places, such as Hong Kong, have developed comprehensive review practices for the import of higher education. In the United States, national, regional, and specialized accreditors are actively engaged in the expansion of their international activity, and the Council for Higher Education Accreditation, the national coordinating body for U.S. accreditation, is beginning to look at principles or good practices that might govern the conduct of U.S. accreditors abroad. This would influence the exporting behavior of U.S. colleges and universities.

None of these solutions, however, fully addresses the question of a global ethos for higher education. An international conversation about quality review and the role of the market should result in an international commitment that higher education is a public good that cannot be left solely to competition for students and money. There is an international public interest that higher education must serve.

* * *

The delicate balance of accreditation, the availability of federal money, and the self-regulation of colleges and universities will require careful attention in the future. Distance learning, by altering the academic work of colleges and universities, is altering the responsibilities of accreditors and the expectations of government about what accreditation should do to assure quality. Accreditors are challenged to respond effectively to changes in government expectations. Absent government's confidence in accreditation to assure quality, this delicate balance will be undermined and the self-regulation of colleges and universities will be at risk.

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Appendix A

Assuring quality in distance learning*

Recommendations and Next Steps

This paper provides background information and analyses to help frame approaches to quality assurance in distance learning programs. Much more remains to be done to gather more complete information about distance learning programs, and considerable attention needs to be paid to strengthening policies and procedures for quality assurance. The pace at which institutions are moving into technology-mediated learning is remarkable. A continuing policy development and research agenda must proceed at the same rate, or quality control for distance learning could be bypassed altogether. Such a turn of events could further degrade public perceptions about the meaning of a college degree, and increase potential for consumer fraud and abuse.

To aid in the development of this policy and research agenda, we conclude with some suggestions for next steps, including:

- A policy agenda for academic accreditation;
- Options for federal policy development; and
- Topics requiring additional research and analysis.

A Policy Agenda for Academic Accreditation

The accreditation model remains a viable and effective means for public quality assurance in distance learning. The research conducted for this paper shows that the core processes of setting and measuring standards can work effectively in distance learning settings. If the decision is made by states or the federal government to increase public financial support for technology-mediated learning–including Title IV financial aid–the accreditation role in the triad of quality assurance remains an effective means to assure quality for purposes of public accountability.

Yet accreditation is challenged by distance learning to adapt standards that are rigorous, to be prepared to re-evaluate traditional processes, to be open to alternatives, and to provide public evidence of measures of performance against the standards. It also must engage in public discussion about fundamental questions regarding the purpose and values of higher education, particularly in degree-granting collegiate programs.

We believe there are central threshold questions about the core qualities of collegiate higher education, and the meaning of a college degree, which accreditors have long struggled with and which have new urgency because of distance learning. They include questions about the core curriculum, and what learning experiences are necessary for the college

*Source: Phipps, R. A., Wellman, J. V., and Merisotis, J. P. 1998. Assuring quality in distance learning. Washington, DC: Council for Higher Education Accreditation. *Note:* References can be found in original document.

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degree to be awarded. They also require clarity about the role of the faculty as professionals in the institution, with delegated authority over central issues like admissions criteria, student evaluation, and the curriculum. This issue is one of both governance and central educational purpose in a collegiate degree-granting institution. Another concern is whether there are minimum requirements for student involvement in an intellectual community as an element of the collegiate learning experience, and the prominence of the acculturation, personal skills, and values development as central qualities of higher education. This issue concerns minimum expectations for time with others in debate, questioning, give and take, and the like. Physical time in a classroom need not be the only–and may not be the best–way to meet these goals; community service or work-study requirements may be alternative ways to achieve them.

Distance learning substitutes traditional community-based approaches to teaching and learning with new kinds of "virtual" communities. Moving into a non-institutionally based model of teaching and learning means that new ways to validate quality must be found that focus on effectiveness in achieving learning goals and outcomes. To do this requires both adapting traditional standards to sharpen the focus on teaching and learning, and providing to the public evidence of effectiveness in meeting goals.

In addition to posing these threshold questions about values and governance, we offer the following specific recommendations for steps that need to be undertaken by the accreditation community:

Establish reliable and valid performance measurements for distance learning.

Almost two decades ago, Howard Bowen (1980) observed that in higher education, true outcomes in the form of learning and personal development of students are on the whole unexamined and only vaguely discerned. It is becoming increasingly important (and some would say imperative) for institutions participating in distance learning to identify a clearly understood set of outcomes, especially student knowledge, skills, and competency levels. Once these student learning outcomes are identified, reliable and valid methods for measuring their achievement should be developed.

Require providers to substantiate evidence of contact between faculty and students.

Faculty contact in and out of class is very important in student motivation and involvement. The concern of faculty often helps students get through rough times and continue their studies. Faculty contact–a primary dimension of interactivity–is a common element to student academic success; the more interactive the instruction, the more effective the learning outcome is likely to be (Sumler & Zirkin, 1995). The key ingredients appear to be the availability of the instructor–whether through direct person-to-person contact or through electronic means–and the intellectual engagement of the student, regardless of the method utilized. Evidence of substantial interactivity between students and faculty should be expected even in situations without full-time or conventional faculty. The issues of core faculty and the faculty role in governance are important but separate considerations.

Require evidence of effective instructional techniques.

There is a substantial body of research evidence relating to effective instruction, and institutions participating in distance learning should embrace these techniques. They include:

Modular Learning: Individualized instructional approaches that "emphasize small, modularized units of content, mastery of one unit before moving to the next, immediate and frequent feedback to students on their progress, and active student involvement in the learning process are consistently effective

in enhancing subject matter learning over more traditional learning formats such as lecture and recitation" (Pascarella & Terenzini, 1991).

Collaboration: Learning is enhanced through cooperation and reciprocity among students. The learning process involves collaboration and a social context, where working together helps each student. Sharing ideas in a group setting improves thinking and deepens understanding. Study groups, collaborative learning, group problem solving, and discussion of assignments can be dramatically strengthened through technology-mediated learning (Chickering & Ehremann, 1996).

Varied Learning Styles: Students learn in many different ways and bring to the learning activity varied talents and experiences. Technology has the enormous potential to enable students to learn in a variety of ways. Technology-mediated learning can provide dramatic visuals and well-organized printed information, encourage self-reflection and self-evaluation, encourage collaboration and group problem solving, and create tasks requiring analysis, synthesis, and evaluation (Chickering & Ehremann, 1996).

Promote systematic efforts for selecting and training faculty.

Not every faculty member will have the skills and temperament for technology-mediated learning. In addition to careful selection of faculty members, proper training with respect to learner needs and the use of technology is essential. Training needs to be continuous because of the changing requirements of technology. Furthermore, an integrated team, such as computer service technicians, counselors, site administrators, distribution clerks, and library resource personnel, is needed to support faculty efforts (Commission on Higher Education, March 1997).

Assure the availability of learning resources.

Libraries and learning resources are being transformed by technology. The rapid pace of replacing traditional libraries and resource centers with computer networks and online retrieval systems requires that students, faculty, staff, and administrators be provided ongoing orientation and training sessions for accessing information.

Promote ongoing monitoring and enhancement of the technology infrastructure of institutions.

In order to assure that students participating in learning activities do not experience interruptions and/or problems in communications, an institution's technological infrastructure needs to be monitored continually and, when appropriate, enhanced. Major components include expanded network capacity, addition of dial-in ports for remote access, enhancement of e-mail, file-serving and other centralized services, creation of a software library, and enhancement of network security.

Focus attention on the development of courseware and the availability of information.

Courseware is, by and large, produced by faculty on campus, commercial enterprises, or a combination of the two. Regardless of the source of courseware development, the ultimate knowledge, skills, and competency levels contained in the courseware should be determined or approved by faculty possessing the appropriate academic and professional experience. With respect to courseware developed commercially, the institutions should validate the academic quality of the materials and ensure that the courseware is consistent with goals and objectives of the institution's curriculum. In addition, knowledge media are replacing the professor as the student's primary source of information. Since faculty are no longer the major source of information, of particular importance is the ability of faculty to guide students through the morass of the Internet to verify the reliability of information.

Faculty also should be capable of identifying or creating courseware that encourages interactivity, collaboration, and modular learning activities, and evokes student motivation.

Examine alternatives to the traditional accreditation process.

The traditional accreditation process has three basic dimensions: the setting of standards, the institutional self-study, and peer evaluation against those standards. The requirements of distance learning suggest that an alternative model, which is less process-driven and more oriented to public information about effectiveness in meeting standards, may be substituted. This is because many distance learning programs–particularly the truly "virtual" universities–do not have the same community of faculty and staff who work together on a daily basis who can easily come together and form review committees. While alternative configurations of committees could be established, including ones that confer by e-mail and conference call, the value added of committee work in contrast to other means of gathering information should be examined.

Options for Federal Policy Development

As Congress approaches the reauthorization of the Higher Education Act, the question looms large of whether–and if so, how–the federal institutional and student financial need standards should change to permit students in distance learning environments to have access to Title IV. There are a number of issues in the current federal standards that appear to be particularly problematic for distance learning, including:

- The definition of "sites," "branch campuses," and "locations," and the requirement that each site meet standards.
- Requirements for program length. Many of the new programs are offered in short-course formats, or are not time-specific at all.
- Standards for administrative capacity, including records management for financial aid offices.
- Requirements for campus security, drug enforcement policies, and crime reporting, when no campus exists.
- The requirement that student credit is recorded either in credit hours or clock hours.
- The requirement that students be enrolled at least six hours to be eligible to receive aid. All other things being equal, the restriction against less-than-half-time students in Title IV could mean that the large majority of students in technology-mediated distance education programs are not eligible for aid, since many of them enroll in only one course at a time.
- The measurement of student financial need. Although the methodology for evaluating income and tuition charges may be adequate for students in these programs, the methodology for calculating student expense budgets–including living expenses, transportation and books–needs to be revisited.

It is easier to identify the regulatory barriers to distance learning than to know how they should be rewritten in a way that does not invite a new spate of fraud in the aid programs. Some of these criteria–such as campus crime data-gathering or the definitions of sites–might be easily changed. But other standards such as financial and administrative responsibility pose more difficult challenges. If enough is not known about how to rework these provisions to accommodate distance learning providers, without inviting new opportunities for fraud, all of the aid programs could become vulnerable. An alternative that might solve the problem would be to create a new definition of a "distance learning" institution in the law, and amend the "experimental sites" provision in the law to extend Title IV eligibility to distance learning institutions that are accredited

by a recognized accreditor but fail to meet federal institutional eligibility standards. The experimental sites provision also would allow monitoring and research to be done so that more appropriate standards can be written in the future.

Issues for Further Research and Analysis

Studying distance learning is somewhat like chasing quicksilver: the pace of change in the field is so rapid–both because of changes in technology and in the organizational arrangements for delivering it–that establishing a solid base of information will be a never-ending task. A research effort to obtain definitive information about the state of distance learning is likely to be protracted and self-perpetuating, and could postpone progress in developing appropriate oversight and quality control policies. Nevertheless, more information would be useful in some areas, both in developing appropriate oversight policies and in knowing more about how distance learning might be used as a substitute for conventional higher education. Key questions requiring further research and analysis include:

- What are the demographic characteristics of students now being served by distance learning programs, and how does this compare to student characteristics for conventional institutional programs?
- What can we generalize about the matriculation, enrollment, and patterns of learning progression for students in distance learning? What percentage of the average course work is received through distance learning? Are programs geared mostly to vocational, or lower division, upper division, graduate, professional, or continuing education?
- Who (or what) is doing the teaching in distance learning programs? Are there faculty, and if so what percentage of their time is accounted for by employment in distance learning programs? What are their compensation patterns?
- Who designs the curriculum and course materials?
- What do we know about the corporate status of distance learning providers? Are they predominantly public, or private, for profit or non-profit? Are they licensed by the state, and if so how are the regulated? What percentage of the private sector entities are publicly traded?
- For consortium or other partnership organizations, what entity awards the degree or certificate?
- What tuition or fees do students pay for distance learning programs? What percentage of total institutional revenues come from tuition or fee sources? What are the other sources of revenue for the programs?
- Can distance learning be provided at the same or lower cost than conventional education?
- Is there greater capacity to measure student learning outcomes in distance learning programs, and if so, how are learning goals set and measured?

Appendix B

12 Important Questions About External Quality Review*

The Council for Higher Education Accreditation (CHEA) is interested in assisting individuals who wish to pursue higher education in the United States. To this end, we have prepared a series of questions that students and others may find useful to ask about the external quality review of a course, institution, or program in which they might enroll.

While CHEA considers external quality review to be an important and constructive process for higher education institutions, external quality review may be only one among many considerations relevant to an individual's choice of a course of study, program, or institution. CHEA does not endorse any specific course of study, program or institution, but encourages careful scrutiny of materials, commitments and claims of all providers of higher education.

If you are considering enrolling in a course of study or program at a higher education institution, you may find it useful to inquire about the external quality review of the course, program, or institution.

1. Is the course, program, or institution accredited?
2. What are the standards of quality? Is there an available summary of the last review?
3. If the course, program, or institution is not accredited, is it certified for quality by another organization?
4. What external quality review is performed by this other organization and what are the standards? Is there a summary of the last review?
5. How can the organization that accredits or provides other types of external quality reviews be contacted?

You may address these and similar questions to:

- The institution or provider under consideration for enrollment
- Certifying organization, if necessary

If you are considering enrolling in an initial course of study or program at one institution and may want to enroll in a further course of study or program at another higher education institution in the future, you may find it useful to inquire about transferability of credits and courses.

1. Will other institutions accept the credits and courses earned?
2. Will other institutions count the credits and courses toward a degree?
3. Will graduate schools accept the credits and courses for admission?
4. Who decides toward what the credits or courses count? How can they be contacted?

* For additional information, contact the Council for Higher Education Accreditation, One Dupont Circle, NW, Washington, DC, at chea@chea.org or www.chea.org.

You may address these and similar questions to:

- The institution or provider under consideration for enrollment
- The institution or provider under consideration for transfer

If you intend to use a course of study or program for employment purposes or would like your employer to provide tuition assistance, you may find it useful to inquire about acceptance of credits and courses by employers.

1. Will employers accept the credits and courses earned?
2. Will employers acknowledge the credits and courses for upgrading, retraining and additional compensation?
3. Who should be contacted to learn what courses and credits an employer may accept?

You may address these and similar questions to:

- The employer or likely future employer

Appendix C

Statement of Commitment by the Regional Accrediting Commissions for the Evaluation of Electronically Offered Degree and Certificate Programs*

Technologically mediated instruction offered at a distance has rapidly become an important component of higher education. Growing numbers of colleges and universities are going on-line with courses and programs, while those already involved are expanding these activities. New providers, often lacking traditional institutional hallmarks, are emerging. This phenomenon is creating opportunities to serve new student clienteles and to better serve existing populations, and it is encouraging innovation throughout the academy. While these are welcome developments, the new delivery systems test conventional assumptions, raising fresh questions as to the essential nature and content of an educational experience and the resources required to support it. As such they present extraordinary and distinct challenges to the eight regional accrediting commissions which assure the quality of the great majority of degree-granting institutions of higher learning in the United States.

The approach of the regional commissions to these emergent forms of learning is expressed in a set of commitments aimed at ensuring high quality in distance education. These include commitment to those traditions, principles, and values which have guided the regionals' approach to educational innovation; commitment to cooperation among the eight regional commissions directed toward a consistent approach to the evaluation of distance education informed through collaboration with others; and commitment to supporting good practice among institutions.

Commitment to Traditions, Values, and Principles

The lengthy history of regional accreditation has been one of adaptation to a changing educational environment, of maintaining high standards while also recognizing that education can be provided effectively in a variety of ways. Responsible innovation has been encouraged within a system of accountability grounded in enduring values and principles through which quality has been defined. The result has been an ever-expanding set of educational opportunities, marked by diversity and excellence, to meet the changing needs of our society. It is in keeping with this tradition that the regional commissions individually and collectively are responding to new forms of distance education. Of necessity, this will be a work in progress; educational change continues apace with technological change making efforts to develop settled definitions of the essential structures and conditions in distance education, and procedures to apply to them, neither possible nor even desirable. Rather, the regionals' response will be developmental, though experience thus far indicates a strong evaluative competence among

*This statement was developed by the eight U.S. regional (institutional) accrediting commissions during 2000 and 2001. For additional information, contact one of these commissions or the Council for Higher Education Accreditation.

individual regional accreditors in responding to the ingenuity of colleges and universities as they use technology to better achieve their educational goals.

As they proceed with the assessment of educational programming offered at a distance, the regional commissions will continue to work toward a balance between accountability and innovation. They will seek to sustain an equilibrium between fulfilling the expectation that regional accreditation is a dependable indicator of institutional quality and encouraging perceptive and imaginative experimentation. Sound departures from traditional formulas will be validated; those falling short will not.

The regional commissions use mission-driven standards to define institutional quality. The college or university that has purposes appropriate to higher education, the resources necessary to achieve those purposes, demonstrates that it is achieving them and has the ability to continue to do so, is one worthy of the distinction of being regionally accredited. This implicitly flexible paradigm is particularly appropriate for the assessment of new forms of distance education as well as technologically spawned innovations in educational practice on-campus.

While endeavoring to maintain balance and flexibility in the evaluation of new forms of delivery, the regional commissions are also resolved to sustain certain values. These include, among other things:

- that education is best experienced within a community of learning where competent professionals are actively and cooperatively involved with creating, providing, and improving the instructional program;
- that learning is dynamic and interactive, regardless of the setting in which it occurs;
- that instructional programs leading to degrees having integrity are organized around substantive and coherent curricula which define expected learning outcomes;
- that institutions accept the obligation to address student needs related to, and to provide the resources necessary for, their academic success;
- that institutions are responsible for the education provided in their name;
- that institutions undertake the assessment and improvement of their quality, giving particular emphasis to student learning;
- that institutions voluntarily subject themselves to peer review.

There can be no doubt that there are challenges in sustaining these important values through technologically mediated instruction. The regional commissions appreciate this reality, and also recognize that these values may be expressed in valid new ways as inventive institutions seek to utilize technology to achieve their goals.

The regional commissions will continue to limit their scope to include only degree-granting institutions of higher learning. They are also aware that many of the educational offerings provided at a distance do not lead to degrees, but rather are short-term and highly focused, providing specific skills-training and leading to at most certificates. Such activities at regionally accredited colleges or universities, or at those that seek regional accreditation, undertaken in their name, are considered as included within the institution's accreditation and thus are subject to evaluation.

The regional commissions are attentive to the fact that their field of view increasingly includes educational entities and configurations which test conventional ideas as to what constitutes an institution of higher learning. Generating opportunities for innovative collaboration and the application of new technologies to education has resulted in unprecedented cooperative agreements and configurations among accredited colleges and universities as well as with entities outside the academy. While frequently resulting in a beneficial expansion of educational opportunity

and a greater optimization of assets, these arrangements often result in a diffusion of responsibility for the overall quality of the student's academic experience. In addition, in these situations quality is often dependent on the continued availability of multiple resources only loosely bound. The regional commission, as they review such arrangements, will consider it essential that accountability be clearly fixed and meaningfully expressed within the accredited entity and that reasonable guarantees are provided to assure the continued availability of necessary resources outside the institution's control.

Commitment to Cooperation, Consistency, Collaboration

The regional approach to quality assurance has served our society well. Though fundamentally similar, the eight commissions have been able to reflect America's rich cultural diversity in their criteria and operations and undertake useful local experimentation from which the whole had benefited. In addition, regionalism has greatly fostered self-regulation by keeping these accreditors close to their member institutions.

Technologically mediated instruction, increasingly asynchronous and web-based, and as such not location dependent, raises questions about the suitability of the regional approach to quality assurance. The regional commissions recognize this. However, they also note that the great majority of collegiate instruction offered in the United States remains on-ground, and that nearly all on-line programming leading to degrees is being provided by traditional institutions which have a substantial academic infrastructure within a single region. To be sure, this may change over time, but for the present, the regional framework continues to be appropriately responsive to the current realities of American higher education and is effective in fulfilling the nation's overall quality assurance needs.

Nonetheless, because the new delivery systems are becoming increasingly important, with institutions developing national and international student populations enjoying only virtual residence, the regional commissions have sought and will continue to seek a significant degree of cross-regional consistency, compatible with their independence and autonomy, in evaluating these activities. Moreover, the commissions are seeking to assure that technologically mediated instruction offered at a distance by whatever institution in whatever region meets the same high standards for quality through the application of an evaluative framework utilizing peer review common to all the regions:

- the first-time development of distance education programming leading to a degree designated for students off-campus will be subject to careful prior review;
- institutional effectiveness in providing education at a distance will be explicitly and rigorously appraised as a part of the regular evaluation of colleges and universities such as the comprehensive visit and interim report;
- an essential element in all evaluative processes will be institutional self-evaluation for the purpose of enhancing quality;
- in cases where deficiencies are identified and/or concerns regarding integrity, remediation will be expected and aggressively monitored;
- appropriate action will be taken in keeping with individual commission policy and procedure in those cases where an institution is found to be demonstrably incapable of effectively offering distance education programming.

As each of the regional commissions continues to accrue skill in assessing distance education programming, they are pledged to learn from the experiences of one another particularly when innovative approaches are utilized.

While most institutions providing educational programming at a distance are clearly based in one of the six regions, placing them within the jurisdiction of the local accrediting commission, technology has already demonstrated the possibility of a virtual institution that is not plainly confined to a given location. In those cases, it is not obvious which regional commission should have quality assurance responsibility. Though few such institutions without apparent regional residency are anticipated, this circumstance presents difficult issues which the regional commissions working through C-RAC are seeking to address.

The regional accrediting commissions are aware of the need for a collaborative approach which extends beyond their community, that others, particularly the states and federal government, have substantial voice in addressing quality assurance issues related to distance education programming. Building on a well-established tradition of cooperation with state higher education offices and the United States Department of Education, the eight commissions are pledged to continue to work individually and collectively with those agencies to achieve our commonly held goals of assuring the quality of academic offerings regardless of the medium of their delivery. To that end, the commissions will seek the continued assistance of the Council on Higher Education Accreditation (CHEA) as a convener and facilitator.

No less importantly, as self-regulatory entities, the regional commissions recognize the necessity of working collaboratively with their affiliated colleges and universities. Each of the commissions have well established practices and procedures to ensure meaningful institutional involvement in developing standards and more broadly defining in general terms the practice of accreditation within its region. It is with a redoubled commitment to the participative involvement of their respective institutional memberships that the regional commissions will fashion their response to the quality assurance challenges created by technologically mediated instruction offered at a distance.

Commitment to Supporting Good Practice

As the higher education community increasingly expand educational opportunities through electronically offered programming, the regional commissions are committed to supporting good practice in distance education among affiliated colleges and universities. Doing so is in keeping with their mission to encourage institutional improvement toward a goal of excellence. To this end several years ago, each commission adopted and implemented a common statement of *Principles of Good Practice in Electronically Offered Academic Degree and Certificate Programs* developed by the Western Cooperative for Educational Telecommunications (WCET), resulting in a shared approach to distance education. More recently, desiring to complement these efforts, the regional commissions collectively, through their national organization, the Council of Regional Accrediting Commissions (C-RAC), contracted with WCET to fashion a more detailed elucidation of those elements which exemplify quality in distance education. Based upon the expertise of WCET and the already substantial experience of the regional commissions in assessing distance education, the resulting statement, *Best Practices for Electronically Offered Degree and Certificate Programs,* provides a comprehensive and demanding expression of what is considered current best practice. It is being utilized by each commission, compatibly with their policies and procedures to promote good practice in distance education among their affiliated colleges and universities.

Appendix D

Council for Higher Education Accreditation Fact Sheet #1: Overview of Accreditation, September 2001*

"Accreditation" is a process of external quality review used by higher education to scrutinize colleges, universities and educational programs for quality assurance and quality improvement. In the U.S., accreditation is carried out by private, nonprofit organizations designed for this specific purpose.

"Recognition" is a process of external quality review of accrediting organizations to affirm their quality and effectiveness. In the U.S., recognition is carried out by a federal agency, the United States Department of Education (USDE), and by a private organization, the Council for Higher Education Accreditation (CHEA).

Institutions and educational programs seek accredited status as a means of demonstrating their academic quality to students and the public and to become eligible for federal funds.

Numbers of Accredited Institutions and Programs

- 6,351 institutions are accredited
- 17,605 programs are accredited

These institutions and programs are accredited by organizations recognized either by the United States Department of Education (USDE) or by organizations recognized by the Council for Higher Education Accreditation (CHEA), or undergoing a CHEA recognition review.

Of the 6,351 institutions:

- 4,119 (64.8%) are degree-granting (associate degree and above)
- 2,232 (35.1%) are non-degree-granting
- 3,563 (56.1%) are nonprofit
- 2,788 (43.8%) are for-profit

Source: CHEA Internal Review, Summer 2001

5,839 accredited institutions are in the federal Title IV (student aid) Program. 3,884 of these institutions are nonprofit and 1,955 are for-profit. 790 foreign institutions are Title IV-eligible (USDE, Office of Student Financial Aid, 2000).

Types and Numbers of Recognized Accreditors

Types of Accreditors

- **Regional:** Regional accreditors operate in eight specific clusters of states (regions) in the U.S. and review entire institutions, 98% or more of which are both degree-granting and nonprofit. There are 2,932 regionally accredited institutions. Almost all institutions are comprehensive.
- **National:** National accreditors operate throughout the country and review entire institutions, 34.8% of which are degree-granting and 65.1% of which are non-degree-granting. 20.4% are nonprofit and 79.5% are for-profit. There are 3,419 nationally accredited institutions. Many are

*For additional information, contact the Council for Higher Education Accreditation, One Dupont Circle, NW, Washington, DC, at chea@chea.org or www.chea.org.

single-purpose institutions focusing on, e.g., education in business and information technology. Some are faith-based.

- **Specialized:** Specialized accreditors operate throughout the country and review programs and some single-purpose institutions. There are more than 17,600 of these accredited programs and single-purpose operations.

In 2000-2001:

- 57 accreditors were recognized by USDE.
- 59 accreditors were recognized by CHEA or undergoing a CHEA recognition review.
- 38 of these accreditors are both USDE- and CHEA-recognized or undergoing a CHEA review.

Source: CHEA 2001 Almanac of External Quality Review

Purposes of Accreditation

Accreditation serves the following purposes:

- **Assuring Quality.** Accreditation is the primary means by which colleges, universities and programs assure academic quality to students and the public.
- **Access to Federal Funds.** Accreditation of institutions and programs is required in order for students to gain access to federal funds such as student grants and loans and other federal support.
- **Easing Transfer.** Accreditation of institutions and programs is important to students for smooth transfer of courses and programs among colleges and universities.
- **Engendering Employer Confidence.** Accredited status of an institution or program is important to employers when evaluating credentials of job applicants and providing financial support to current employees seeking additional education.

Recognition Purposes and Standards

USDE and CHEA each review the quality and effectiveness of accrediting organizations:

- USDE's primary purpose is to assure that federal student aid funds are purchasing quality courses and programs. USDE's recognition is based on ten standards that include attention to, e.g., recruitment and admission practices, fiscal and administrative capacity and facilities.
- CHEA's primary purpose is to assure and strengthen academic quality and ongoing quality improvement in courses, programs and degrees. CHEA's recognition is based on five standards that include, e.g., advancing academic quality and encouraging needed improvement.

Please visit the USDE Website at www.ed.gov/offices/OPE/accreditation/ for additional information about the USDE recognition standards and a list of recognized accreditors. Please visit the CHEA Website at www.chea.org for additional information about the CHEA recognition standards and a list of CHEA accreditors.

Accreditation of Distance Learning

- Most distance learning currently available is offered by accredited institutions. USDE reported that 1,680 institutions were offering distance learning in 1997-98, all of which were accredited institutions.
- 17 of the 19 (89.4%) institutional accreditors (regional and national) that are USDE- or CHEA-recognized (or undergoing a CHEA recognition review) are actively engaged in scrutinizing distance learning. This involves the application of accreditation standards, guidelines or policies to distance learning courses, programs and degrees to determine academic quality. Where appropriate, accreditors have modified and expanded their practices to address unique features of distance learning (e.g., examination of computer mediated instruction may vary from examination of classroom-based instruction).
- Both USDE and CHEA review the distance learning activities of these accreditors:
  - Based on the 1998 reauthorization of the Higher Education Act, current USDE recognition standards are applied to accreditors' standards, policy and guidelines for all types of educational delivery, including distance learning.
  - CHEA recognition standards are applied to accreditors' standards, policy and guidelines for all types of educational delivery, including distance learning.

The Council for Higher Education Accreditation (CHEA) is a nationally based, private, nonprofit organization that coordinates national, regional and specialized accreditation and represents 3,000 degree-granting accredited institutions and 59 accrediting organizations (2000-2001). CHEA's primary responsibilities are advocacy for self-regulation of higher education through voluntary accreditation, scrutiny ("recognition") of accrediting organizations and articulation and presentation of key accreditation issues and challenges to higher education, government and the public.

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Appendix E

Council for Higher Education Accreditation Fact Sheet #2: The Role of Accreditation and Assuring Quality in Electronically Delivered Distance Learning, September 2001*

Institutional (national and regional) and programmatic (specialized) accreditors have been reviewing distance-based higher education since the establishment of correspondence schools more than 100 years ago. With the advent of the World Wide Web and Internet-based distance learning, accreditors are now actively engaged in refining and applying their quality review practices to meet the needs of electronically delivered courses, programs and degrees. Fact Sheet #2 provides a brief description of the role of accreditation to assure quality as distance learning opportunities expand and diversify.

Who Offers Electronically Delivered Distance Learning?

- The United States Department of Education (USDE) reports that 1,680 institutions were offering distance learning in 1997-98. These institutions are accredited and enrolled 1.6 million distance learning students in 1997-98.**

How Is Distance Learning Reviewed for Quality?

- Accreditation (external peer review of institutions and programs to assure and improve quality) is the primary means by which higher education distance learning offerings are currently reviewed for quality. Accreditors are responsible for scrutiny of distance learning for all higher education institutions and programs they review that offer education through distance.
- 17 of the 19 (89.4%) "recognized" institutional accreditors (regional and national) are actively engaged in scrutinizing distance learning–applying accreditation standards, guidelines or policies to distance learning offerings and degrees to determine academic quality.*** Where appropriate, accreditors have modified and expanded their practices to address unique features of distance learning.
- Accreditors do not employ identical review practices to assure quality in distance learning. Standards, policies and guidelines vary by the type of accreditor and the type of institution or program that is reviewed.

*For additional information, contact the Council for Higher Education Accreditation, One Dupont Circle, NW, Washington, DC, at chea@chea.org or www.chea.org.

** *Distance Education at Postsecondary Education Institutions 1997-98,* United States Department of Education, National Center for Education Statistics Report, NCES 2000-013, December 1999. Most recent data available.

***"Recognition" is a status achieved by accrediting organizations that have undergone a review of their quality and met the standards of either the USDE or the Council for Higher Education Accreditation (CHEA), a private organization that coordinates regional, national and specialized accreditation.

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Regional Accreditation

The eight regional accrediting commissions are adopting a common platform for review of distance learning.* This platform calls for scrutiny of teaching and learning, curriculum, student services, faculty and evaluation practices. The Statement and Best Practices affect approximately 3,000 colleges and universities:

- Middle States Association of Colleges and Schools, Commission on Higher Education (www.msache.org)
- New England Association of Schools and Colleges, Commission on Institutions of Higher Education (www.neasc.org)
- New England Association of Schools and Colleges, Commission on Technical and Career Institutions (www.neasc.org)
- North Central Association of Colleges and Schools, The Higher Learning Commission (www.ncahigherlearningcommission.org)
- Northwest Association of Schools, Colleges and Universities; Commission on Colleges and Universities (www.cocnasc.org)
- Southern Association of Colleges and Schools, Commission on Colleges (www.sacscoc.org)
- Western Association of Schools and Colleges, Accrediting Commission for Community and Junior Colleges (www.wascweb.org)
- Western Association of Schools and Colleges, Accrediting Commission for Senior Colleges and Universities (www.wascweb.org)

National Accreditation

The nine national accreditors have independently developed standards for distance learning. These standards are often accompanied by additional requirements from the accreditors such as special reports, expanded attention to student learning outcomes and special site visits. These standards affect more than 2,400 institutions:

- One accreditor has developed new standards: Accrediting Commission of Career Schools and Colleges of Technology (www.accsct.org)
- One accreditor reviews only distance learning operations: Accrediting Commission of the Distance Education and Training Council (www.detc.org)
- One accreditor has developed supplemental standards: Accrediting Council for Independent Colleges and Schools (www.acics.org)
- Two accreditors have standards that specifically address extension offerings, alternative sites and delivery systems including distance learning: Accrediting Association of Bible Colleges, Commission on Accreditation (www.aabc.org) and Association of Theological Schools in the United States and Canada, Commission on Accrediting (www.ats.edu)
- One accreditor has standards specifically for interactive distance learning: Accrediting Council for Continuing Education and Training (www.accet.org)

*Statement of Commitment by the Regional Accrediting Commissions for the Evaluation of Electronically Offered Degree and Certificate Programs and Best Practices for Electronically Offered Degree and Certificate Programs, 2001. Available from the Websites of the regional accreditors.

- Three accreditors are using the same standards for review of distance learning that are used for site-based education: Accrediting Bureau of Health Education Schools (www.abhes.org), Council on Occupational Education (www.council.org), Transnational Association of Christian Colleges and Schools Accrediting Commission (www.tracs.org)

How Are Accrediting Organizations Held Accountable for Review of Quality of Distance Learning?

- Both CHEA and USDE undertake recognition reviews of accreditors, including their distance learning activities, on a periodic basis. In addition, accreditors that develop new standards or policies for distance learning may undergo a special review.
- CHEA recognition standards are applied to accreditors' standards, policy and guidelines for all types of educational delivery, including distance learning. These standards include attention to advancing academic quality, demonstrating accountability and encouraging needed quality improvement.
- USDE recognition standards are applied to accreditors' standards, policy and guidelines for all types of educational delivery, including distance learning. These standards include attention to recruitment and admission practices, fiscal and administrative capacity and facilities.

Appendix F

Principles for U.S. Accreditors Working Internationally: Accreditation of Non-U.S. Institutions and Programs*

Purpose

These principles are to advise Council for Higher Education Accreditation (CHEA) accrediting organizations and to provide a framework for U.S. accreditors undertaking reviews of non-United States (U.S.) institutions and programs operating in countries outside the U.S. They are intended to strengthen the working relationship among U.S. accreditors and international quality assurance agencies and encourage and enhance ongoing cooperation and communication.

Principle 1. Considerations and Actions for U.S. Accreditors When Determining to Undertake Accreditation of Non-U.S. Institutions and Programs in Another Country

U.S. accreditors will:

- Assure that they have the organizational capacity to undertake an international review (e.g., language, trained staff and evaluators, budget, experience, basic information about the country);
- Promulgate a clear statement of the scope of the accreditation and the use of U.S. accredited status by an institution or program in another country, especially with regard to transfer of credit and degree and qualifications equivalency;
- Assure clear understanding of the relationship of the U.S. review to any international agreements that address accreditation and quality assurance;
- Clarify the relationship of international review activity to the priorities of the accrediting organization;
- Communicate with other U.S. accreditors about international review activity.

Principle 2. Expectations for Conduct of U.S. Accreditation Reviews of Non-U.S. Institutions and Programs in Another Country

U.S. accreditors will:

- Inform, consult and cooperate with national quality assurance agencies in countries where reviews are undertaken and seek information and guidance from these agencies;
- Communicate with chancellors, presidents and rectors and other college and university officials at institutions where reviews are undertaken;
- Assure that U.S. staff and evaluators are adequately informed about higher education and quality assurance in the countries in which they are conducting reviews to preclude the appearance of cultural insensitivity;
- Communicate fully and clearly about costs and currencies associated with a review.

* Developed by the Council for Higher Education Accreditation, One Dupont Circle, NW, Washington, DC, chea@chea.org or www.chea.org.

Principle 3. Accreditor Expectations of Providers of U.S. Online and Web-based Instruction and Programs Exporting to Another Country

U.S. accreditors will:

- Work closely with U.S. institutional and programmatic exporters of online and Web-based education to assure quality as offerings are made available in a variety of countries, especially when Web-based and online offerings involve instructional strategies that are unfamiliar to the host country;
- Work with U.S. exporters to inform potential students of the language expectations and requirements associated with online and Web-based courses, programs and degrees;
- Work with U.S. exporters to review language, literacy and study skill levels of the target audience for online and Web-based offerings, preparing separate or supplemental material to meet special needs if appropriate.

Principle 4. Responsibilities of U.S. Accreditors Working with Non-U.S. Institutions and Programs to Students and Colleagues in Another Country

U.S. accreditors will:

- Work with other countries to provide the most comprehensive and accurate information available about U.S. exports to avoid "accreditation mills" and "diploma mills";
- Develop, working with international colleagues, an information protocol that can be used to assist countries in reviewing imports from the U.S.

About the Author

Judith S. Eaton is president of the Council for Higher Education Accreditation (CHEA). CHEA is a private, nonprofit national organization that coordinates accreditation in the United States. CHEA represents more than 3,000 colleges and universities and 60 national, regional, and specialized accreditors.

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